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6 Attorney for Defendant
FAUSTO PINA

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 vs.
14 FAUSTO PINA,
15 Defendant.
16
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Case No. 1:21-CR-00070-NODJ-BAM

**STIPULATION TO CONTINUE
SENTENCING DATE; ORDER**

DATE: July 15, 2024
TIME: 9:00 a.m.

18 **STIPULATION**

19 Defendant, FAUSTO PINA, by and through his counsel of record, and Plaintiff, United
20 States of America, hereby stipulate as follows:

- 21 1. By previous order, this case was set for sentencing on July 15, 2024.
- 22 2. By this stipulation, defendant now moves to continue the sentencing hearing until
23 September 23, 2024. As this is a sentencing and a change of plea and admission have already
24 been entered, no exclusion of time under the Speedy Trial Act is required.
- 25 3. The parties agree and stipulate, and request that the Court find the following:
 - 26 a) Counsel for defendant has been seeking and investigating different
27 mitigation documents related to defendant and vital at sentencing, including records from
28 outside of the United States. In addition, information relevant to sentencing has recently

1 become available, and the parties both require additional time to further investigate.

2 b) Counsel for defendant believes that failure to grant the above-requested
3 continuance would deny her the reasonable time necessary for effective preparation,
4 taking into account the exercise of due diligence.

5 c) The government does not object to the continuance.

6 IT IS SO STIPULATED.

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8 Respectfully submitted,

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10 HEATHER E. WILLIAMS
11 Federal Defender

12 Dated: June 25, 2024

/s/ Meghan D. McLoughlin
MEGHAN D. McLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
FAUSTO PINA

15 Dated: June 25, 2024

/s/ Kimberly A. Sanchez
KIMBERLY A. SANCHEZ
Assistant United States Attorney

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19 **ORDER**

20 IT IS SO ORDERED that the sentencing hearing is continued from July 15, 2024, to
21 **September 23, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.**

22 IT IS SO ORDERED.

23 Dated: **June 25, 2024**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE